

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

HARRY KAMIN,
Individually and Derivatively on behalf of
BNG GROUP LLC,

Plaintiffs,

v.

VALERIA GUNKOVA,
JACOB BOGATIN,
SKIN LOGIC LLC d/b/a ARIA MEDISPA,
VNJ MANAGEMENT LLC,
and
STERLING INVESTMENTS LLC,

Defendants.

Civil Action No.
1:23-cv-01481-MSN-LRV

Removed from the
Circuit Court of Loudoun County
Case No. CL-21-1557

WITHDRAWAL OF NOTICE OF REMOVAL WITHOUT PREJUDICE

Plaintiff Harry Kamin, individually and derivatively on behalf of BNG Group LLC (“Mr. Kamin”), by counsel, hereby withdraws without prejudice the Notice of Removal of the above-captioned civil action from the Circuit Court of Loudoun County, Virginia to the United States District Court for the Eastern District of Virginia, Alexandria Division along with the

Marc E. Albert, No. 26096
Tracey M. Ohm, No. 77150
STINSON LLP
1775 Pennsylvania Ave., N.W., Suite 800
Washington, DC 20006
Tel. (202) 728-3020; Fax (202) 572-9943
marc.albert@stinson.com
tracey.ohm@stinson.com

Bethany R. Benes, No. 85408
BETHUNE BENES, PLLC
3975 Fair Ridge Drive
South Suite 246
Fairfax, Virginia 22033
Tel.: (703) 260-9322
bbenes@bethunebenes.com

accompanying copies of the process and pleadings filed as Notices of Submissions, Dkt. Nos. 1-13.

Dated: December 6, 2023

Respectfully submitted,

/s/ Tracey M. Ohm

Marc E. Albert, No. 26096

Tracey M. Ohm, No. 77150

STINSON LLP

1775 Pennsylvania Ave., N.W., Suite 800

Washington, DC 20006

Tel. (202) 728-3020; Fax (202) 572-9999

marc.albert@stinson.com

tracey.ohm@stinson.com

and

Bethany R. Benes, No. 85408

BETHUNE BENES, PLLC

3975 Fair Ridge Drive, South Suite 246

Fairfax, Virginia 22033

Tel.: (703) 260-9322

bbenes@bethunebenes.com

*Counsel for Harry Kamin, individually and
derivatively on behalf of BNG Group LLC*

CERTIFICATE OF SERVICE

I certify that on this 6th day of December, 2023, the foregoing Withdrawal of Notice of Removal was electronically filed with the United States District Court for the Eastern District of Virginia, Alexandria Division, using the Court's ECF system. I further certify that on December 6, 2023 the foregoing Withdrawal was served upon counsel of record for the defendants in the Loudoun Case and bankruptcy counsel for the defendants in the Loudoun Case via first-class mail, postage prepaid as follows:

Nancy Greene
N D Greene PC
3977 Chain Bridge Rd., Suite 1
Fairfax, VA 22030

Skin Logic LLC d/b/a Aria MediSpa
Attn. Valeria Gunkova
2 Pidgeon Hill Drive, Suite 100
Sterling, VA 20165

Jeffery T. Martin, Jr.
Martin Law Group, P.C.
7918 Jones Branch Drive, 4th Floor
Mc Lean, VA 22102

VNJ Management LLC
Attn. Valeria Gunkova
2 Pidgeon Hill Drive, Suite 110
Sterling, VA 20165

Maurice Belmont VerStandig
The VerStandig Law Firm, LLC
9812 Falls Roads, #114-160
Potomac, MD 20854

Sterling Investment LLC
Attn. Valeria Gunkova
2 Pidgeon Hill Drive, Suite 120
Sterling, VA 20165

Sean Patrick Roche
Richard G. Cole III
Cameron/McEvoy PLLC
4100 Monument Corner Drive, Suite 420
Fairfax, VA 22030

Skin Logic LLC
c/o Stephen Metz, Trustee
Offit Kurman, P.A.
7501 Wisconsin Ave, Suite 1000W
Bethesda, MD 20814

Jacob Bogatin
20701 Riptide Sq.
Sterling, VA 20165

/s/ Tracey M. Ohm
Tracey M. Ohm